TANNEN LAW GROUP, P.C. 77 W. Washington St., Suite 500 Chicago, IL 60602 Telephone: (312) 641-6650 Michael Murphy Tannen, Esq. *Attorneys for Diana Arney* 

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:	)	
	)	Chapter 11
SEARS HOLDINGS CORPORATION, et al.,	)	
	)	Case No. 18-23538
Debtors.	)	(RDD)
	)	(Jointly Administered)

## NOTICE OF RESPONSE OF UNIDENTIFIED AND UNIDENTIFIABLE FUTURE CLAIMANT DIANA ARNEY TO MOTION TO ENFORCE SALE ORDER AND FOR OTHER RELIEF OF RULE 363 ASSET PURCHASEER THRANSFORM

PLEASE TAKE NOTICE that Michael M. Tannen of Tannen Law Group, P.C. submitted for electronic filing with the ECF filing system a copy of this notice and the Response of Unidentified and Unidentifiable Future Tort Claimant Diana Arney to Motion to Enforce Sale Order and for Other Relief of Rule 363 Asset Purchaser Transform on September 13, 2021.

Respectfully Submitted, TANNEN LAW GROUP, P.C.

By: /s/ Michael M. Tannen

Attorneys for Diana Arney

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of September, 2021, I caused a true and correct copy of the foregoing Notice and Response of Unidentified and Unidentifiable Future Tort Claimant Diana Arney to Motion to Enforce Sale Order and for Other Relief of Rule 363 Asset Purchaser Transform to be filed and served through ECF notification upon all parties who receive notice in this matter pursuant to the Court's ECF filing system. I further certify that I sent same via email delivery or via Federal Express as per the service list below.

1st Michael M. Tannen

Michael M. Tannen,

## Service List

**Luke Barefoot**, lbarefoot@cgsh.com, Cleary Gottlieb Steen & Hamilton LLP Counsel for Transform SR Brands LLC

Jacqueline Marcus, <u>Jacqueline.Marcus@weil.com</u>; Phil DiDonato, Philip.DiDonato@weil.com, Weil, Gotshal & Manges LLP Counsel for Sears Holdings Corp, et al.

Paul Schwartzberg, <u>paul.schwartzberg@usdoj.gov</u>; Richard Morrissey, richard.morrissey@usdoj.gov

**The Honorable Judge Robert Drain,** via FedEx on September 14, 2021 to 300 Quarropas Street, Suite 248, White Plains New York, 10601